

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814

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May 19, 1980

ALL-COUNTY LETTER NO. 80-32

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: IMPLEMENTATION OF FEDERAL "POINTS AND HOURS" OF CERTIFICATION AND
ISSUANCE SERVICES

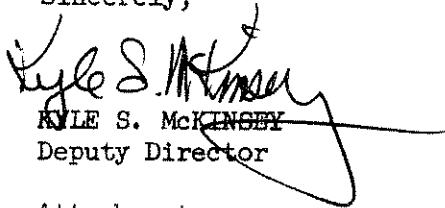
The purpose of this letter is to inform counties that the final rules for "points and hours" of food stamp certification and issuance services were published in the January 11, 1980 Federal Register and to request county assistance in implementing the provisions of these regulations.

The new rules prescribe minimum levels of certification and issuance services that shall be available in each county and also specify a mandatory implementation plan (a summary of these rules are in Attachment A). These rules have not significantly changed from the July 13, 1979 proposed version which was released to counties on July 25, 1979. At that time, our analysis indicated that most counties already provide certification and issuance services in excess of the minimum requirements. The federal regulations also require the preparation and submittal of county service plans to FNS within 120 days for publication of final rules. The service plan requires a corrective action plan. At the request of many counties and after considerable discussion with FNS staff, we have decided that state staff will develop a state-wide service plan through the use of a survey questionnaire (Attachment B) which will satisfy both the service plan and corrective action plan requirements. The questionnaire will reduce implementation time and also simplify the state's development of the service plan at the county level. Counties will be required to complete and submit the questionnaires to SDSS-Food Stamp Program Management Branch for compilation by June 9, 1980.

Since counties are more closely associated with local conditions, it will be their responsibility to post public comment material (Attachment C) and to assess public response. Notices should be displayed in all certification and issuance offices so that clients are aware of the comment period and the subject open for comment. Most likely the 30-day public comment period will not have expired before the survey questionnaires are to be sent to SDSS. However, counties must submit the questionnaires by June 9, 1980 regardless of whether all comments were received and, if necessary, amendments to the questionnaire would be submitted at a later date.

If you should have any questions regarding this request, please contact your Food Stamp Program Operations consultant at (916) 322-5475. Thank you for your continued cooperation.

Sincerely,


KYLE S. MCKINSEY
Deputy Director

Attachments

cc: CWDA

FINAL POINTS AND HOURS OF CERTIFICATION AND ISSUANCE RULES SUMMARY

IMPLEMENTATION OF POINTS AND HOURS

- I. A service plan for each county must be completed within 120 days from January 11, 1980 (publication of the rulemaking).
 - A. SDSS-FSPMB shall:
 1. Review for regulatory compliance;
 2. Approve or deny exceptions which SDSS-FSPMB is authorized to act upon.
 - B. FNS/WRO shall:
 1. Approve or deny exceptions which FNS/WRO is authorized to act upon.
- II. FNS/WRO shall approve or deny all requests for exceptions within 30 days of receiving them. All requests not acted upon within the 30-day period shall be considered approved.
- III. Counties shall have the services described in their local service plans in operation within sixty days of the service plan completion date.
 - A. Corrective Action Plans

Corrective action plans shall be prepared for counties that will not be in compliance with the minimum service standards on the effective date of plans established in III above.
 - B. Submittal of Corrective Action Plans
 1. If an exception as established in I above is denied by FNS/WRO, a corrective action plan shall be submitted within 30 days of SDSS' receipt of FNS' denial.
 2. All other corrective action plans must be submitted within 120 days from January 11, 1980 (publication of rulemaking).
 - C. Completion Date of Corrective Action
 1. The completion date of corrective action shall be within six months of the effective date of the local service plan.
 2. FNS/WRO may grant an extension if SDSS-FSPMB demonstrates that compliance with one or more of the minimum points and hours standards would:

- a. Require more than six months for legislative action;
- b. Require action by an adjourned State Legislature;
- c. Require a change in a union contract;
- d. Require a change in a county's physical plant.

SDSS FSPMB must demonstrate, on an individual county basis, that there are no other means of achieving compliance other than that proposed in the corrective action plan.

IV. Minimum Elements of the Initial Needs Assessment and Service Plan:

A. Indicate the number of certification and issuance sites within each county and their hours of operation during January 1980.

B. Needs assessment of certification and issuance.

1. Minimum Requirements:

- a. Examination of size and geographic location of the participants and potentially eligible population in each county;
- b. Examination of the transportation costs which clients incur to reach certification and issuance services;
- c. Examination of the availability of public transportation;
- d. Examination of the cyclical changes in participation because of seasonal employment;
- e. Public comment and consultation with groups on the certification and issuance services in each area (30-day period), and
- f. Special certification and issuance service needs of migrants.

C. Service Plan

1. Each county shall prepare service plan based on the results of the needs assessment.

2. Minimum Requirements:

- a. Descriptions of the certification and issuance services that will be offered in each county;
- b. The factors affecting certification and issuance which were examined during the needs assessment study;

- c. The conclusions drawn from the examination of the factors;
 - d. Summaries of public comment;
 - e. Exceptions that are requested;
 - f. Documentation of SDSS approved exceptions together with SDSS' justification; and
 - g. For counties with migrant farmworkers, a description of the special needs assessment and any special certification or issuance services that are planned to meet the migrant worker's needs.
3. The service plan for each county must be retained by SDSS.
4. In considering state level exceptions, SDSS shall determine:
 - a. Whether the exception complies with the points and hours rules; and
 - b. Whether the service that would exist if the exception were granted would be adequate to meet the needs of the clients.
5. In addition to the above, the initial service plan shall include the latest monthly participation figures and indicate in each county's service plan what participation data were used.
6. Allowable State Level Exception Approvals:
 - a. Approval of a service plan that does not make certification services available during the lunch period if the plan indicates that compliance cannot be achieved for statutory or security reasons.
7. Allowable FNS Exceptions:
 - a. FNS may extend the period for the completion of corrective action plans.
 - b. If a county has fewer than 250 monthly participants, FNS may approve alternate levels of required certification services if:
 1. The caseload is so small that the 30-hour requirement is excessive, provided that an adequate number of hours of certification services are available for the caseload size; or

2. Arrangements are made for clients to receive the 30 hours of certification service in another county without having to travel unreasonable distances.
- c. FNS may approve exceptions from the 30-mile radius requirement if SDSS demonstrates that clients normally travel more than 30 miles to a place with various stores to conduct their personal business and use their coupons.
- d. FNS may approve exceptions to the "maintenance of effort" section if SDSS can demonstrate that the county caseload has changed in size and location.

ISSUANCE

- I. Counties are responsible for determining the location and hours of operation of the issuance services made available in each county.
- II. However, the following minimum issuance service requirements must be met:
 - A. All eligible applicant households must be given an opportunity to obtain coupons within 30 days of filing their applications.
 - B. Any applicant who receives expedited service and who receives an ATP card must be given an opportunity to obtain coupons within one calendar day, excluding weekends and holidays, of receiving it.
 - C. Points and Hours of Issuance Services
 1. All Participants
 - a. In counties that use either an ATP or HIR card system, six hours of issuance service each calendar week shall be available to all participants.
 - b. These issuance sites are not subject to the 30-mile radius requirement for location.
 2. Participants on Regular Issuance Cycle
 - a. ATP Issuance - At least six hours/month of issuance services shall be made available to all participants on regular issuance cycles. These services shall be available to recipients within seven calendar days following the receipt of the ATP card. Issuance services shall be located at sites that are within 30 miles of the residences of all or all but a small number of participants.
 - b. HIR Issuance - At least six hours of issuance services shall be made available between the first and the fifteenth of each calendar month to all recipients on regular issuance cycles. The six hours of issuance shall be divided between at least two days at approximately the same time each month. Counties which assign recipients to particular issuance sites must offer six hours of service at each site. Issuance services shall be located at sites that are within 30 miles of the residences of all or all but a small number of participants.
 - c. Over the Counter - Counties that locate issuance services so that there are small numbers of participants that are not located within 30 miles of services for the required number of hours shall give

MINIMUM SERVICE LEVELS

Certification

- I. Counties are responsible for determining the location and hours of operation of the certification services made available in each county.
- II. However, the minimum certification service requirements must be met:
 - A. Basic certification services provided in each county must be established so that all but a small number of households reside within 30 miles of a site that provides at least four hours of basic certification services every two weeks.
 1. Any applicant or participant that does not reside within 30 miles of four hours of basic certification services every two weeks shall be eligible for out-of-office certification.
 2. FNS may approve exceptions from the 30-mile requirement if the state can demonstrate that participants normally travel more than 30 miles to a place with various stores to conduct their personal business including the use of their coupons.
 - B. Counties with more than 250 monthly households participating must provide at least 35 hours/week of basic certification services in at least one office.
 1. In offices with more than two eligibility workers, these services shall be scheduled so that there is no break in services during lunch.
 - C. Counties with 250 or fewer monthly households participating must provide a minimum of 30 hours of basic certification services each month in at least one office.
 1. There must be a location in each county where applications can be picked up by applicants during all normal business hours and a location to deposit applications when they are completed.
 - D. If an applicant is unable to obtain certification services without missing time from work applicant must be given an appointment for services.
- III. Basic certification services consist of distributing and accepting applications, interviewing applicants, and accepting notices of change in household circumstances.

such household the option of either traveling more than 30 miles to receive their coupons or having them provided by mail.

- d. FNS may approve exceptions to the distance requirement if it can be shown that participants normally travel more than 30 miles to a location to conduct personal business and use their coupons.

MAINTENANCE OF EFFORT:

- I. State agencies shall not reduce the number of certification sites and hours or issuance hours in each county below the number of sites and hours available in January 1980.
- II. State agencies shall request and obtain FNS' approval before reducing the number of sites below those available in January 1980.
 - A. Approval of such exceptions may be granted only if:
 1. A county can demonstrate that the caseload has changed in size or location; thus warranting a change in services, or
 2. A county can demonstrate that the change in level of service will result in an improvement in service.

Counties may shift services from one location to another or change hours of service available at a particular location, provided that the total number of sites and hours are not reduced below the totals in effect during January 1980.

COUNTY SERVICE PLAN

COUNTY _____

PREPARED BY _____

DATE _____

PART I. CERTIFICATION SERVICE PLANA. January 1980 Points and Hours

1. At a minimum, a certification office is one which distributes and accepts applications, interviews applicants, and accepts Notices of Change (DFA 377.5). Complete the following for each certification office operating within the county during January 1980. Include satellite and mobile offices.

<u>Site (Address)</u>	<u>Hours Open Each Day</u>	<u>Days Open</u>	<u>Weeks Open</u>	<u># FS EWs</u>	<u>Hrs./Mo.</u>
Example: 4 Food Stamp Road	8 am - 5 pm Open during lunch	M-F	1st, 2nd week in each month	4	

Total No. of Sites _____

Total Hours _____

2. The total number of certification sites and hours of operation may not be reduced below the January 1980 level without approval. If the number of certification sites or total service hours currently available each month has been reduced from what was available during January 1980, describe the change and explain why the change was necessary.

B. Participation Data

1. The county shall use the latest participation figures available to determine points and hours requirements.
 - a. Using the latest available data, how many households currently participate monthly in the county? Indicate the source and month the data came from, e.g., the March 1980 FNS 256. If the latest data was not used because it does not reflect a representative caseload, indicate why it was not used.

C. Hour Requirements

1. Counties of 251 or more households.
 - a. Thirty-five nonoverlapping hours of service must be offered each week (in weeks without holidays) in each county, e.g., 35 hours in the same office or 35 nonoverlapping hours in several offices. If there are more than two FS eligibility workers employed at any office, lunch-hour service must be offered unless an exception is granted.

- i) Do the offices listed in I(A) meet this requirement?

- b. Exception request/documentation OR corrective action plan.

2. Counties of 250 or fewer households.

- a. Thirty nonoverlapping hours of service must be offered each month in the county, e.g., 30 hours in the same office or 30 nonoverlapping hours in several offices. Some of the 30 hours must be offered during each calendar week and the hours should be consistent from month to month.
 - i) Do the offices listed in number I(A) meet this requirement.

- ii) Exception request/documentation OR corrective action plan.

b. If at least one office is not open during normal business hours (8 a.m. to 5 p.m.) each business day, a place must be made available where applications can be picked up and dropped off during normal business hours each business day. The address(es) where applications should be mailed must also be available at the pick-up point.

- i) If at least one office is not open during normal business hours each business day, list the address(es) where applications can be picked up.

- ii) Where applicable, list the addresses where applications can be dropped off. Also, attach a copy of the instructions which are used to explain the household's option to mail or drop off the application.

iii) Corrective action plan.

c. If periodic increases in caseload are expected that will cause monthly participation to increase above 250 households for less than four consecutive months, special plans must be made to handle the increased caseload.

i) Indicate the nature of the expected influx, describe the special services (e.g., additional hours of basic certification services) that will be offered, and the month(s) involved.

ii) If no special services are offered, fully explain the reason, e.g., the expected caseload is only 275 cases.

iii) Corrective action plan.

D. Appointment Requirements

1. Appointments must be offered to any household which must miss work in order to complete the application process. The service must be made known to any person who indicates that he works during all or nearly all scheduled hours of certification.
 - a. Indicate whether appointments are offered which would minimize absence from work.

b. Are appointments offered outside of business hours?

c. How is the required appointments system generally publicized and households informed of appointment availability?

d. Corrective action plan.

E. Certification Points

1. Certification offices must be located so that there is a certification office open four hours in each two-week period within 30 miles of all or all but a small number of households. Itinerant service may be used to meet this requirement. (Attach a map of the county with the areas of coverages indicated.)
 - a. Are offices or itinerant service used to meet this requirement?
 - b. If itinerant certification service was provided, indicate which sites listed in number I(A) meet this requirement.

- c. What percentage of the caseload is covered by these offices and/or itinerant service?

2. Exception request/documentation OR corrective action plan.

3. Households not living within 30 miles of four hours of certification service in each two-week period are eligible for out-of-office certification. Such households shall be advised when they inquire about the program that they qualify for this service.

- a. Indicate how this service is generally publicized and household informed of the availability of out-of-office certification.

- b. Exception request/documentation OR corrective action plan.

PART II. ISSUANCE SERVICE PLAN

A. January 1980 Points and Hours

- 1. The county may not reduce the number of issuance hours below those available in January 1980 without approval.

- a. List the total number of issuance sites hours available in the county during January 1980. Count the total at all sites, even if the hours overlap, for example, if two issuance sites were open from 9 a.m. to 2 p.m. on the same day, 10 hours would be listed. (Attach a map of the county indicating issuance sites.)

<u>Address</u>	<u>Hours Opened Each Day</u>	<u>Days Open</u>	<u>Weeks Open</u>	<u>Total Hrs./ Month</u>
Example: 1 Issuance Site	9 hrs. (8 am - 5 pm)	M-F	1st & 2nd week each month	90 hrs.

Total	<u>No. of Sites</u>	<u>Total Hrs./Day</u>	<u>Hours/Month</u>
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b. Has the county reduced the total number of issuance sites and hours below the total in effect in January 1980? If yes, describe the circumstances and explain why the change was necessary, e.g., county initiated (direct) mail issuance.

c. List changes in sites and/or hours.

B. Issuance Services

1. Are all eligible households in the county offered either direct mail issuance or mail issuance with the use of an ATP?
2. Are all eligible households given an opportunity to obtain coupons within 30 days after filing their applications?
3. Are all households that are entitled to expedited service given an opportunity to obtain coupons within one calendar day (excluding weekends and holidays) of receiving an ATP?

If the answers to 1, 2 and 3 are yes, the issuance section of the service plan has been completed. If the answer is no, continue on.

C. Hour Requirements

1. General Availability

- a. All participants must have access to six hours of issuance service each calendar week.
 - i) Do the sites listed in II(A) above meet this requirement? For this requirement, do not count hours which overlap at two or more sites.

b. Corrective action plan.

2. Authorization to Participate (ATP) Card System

- a. At least six hours of issuance services shall be made available each month to participants on regular issuance cycles within seven calendar days following the household's receipt of the ATP card (the ATP receipt date may be considered as two days after the mailing of the ATP).
- i) On what date are ATP's normally mailed in the county? Indicate which sites offer services that meet the above requirement. (The hours discussed in number (II A) may be taken into consideration; however, do not count hours which overlap at two or more sites.)

ii) Corrective action plan.

b. Any applicant who receives expedited service must be able to obtain coupons within one calendar day excluding weekends and holidays, of receiving an ATP.

1) Does the county have issuance services available to do this?

2) Corrective action plan.

3. Household Issuance Record (HIR) System

- a. A total of at least six hours, divided between at least two days, shall be made available between the first and the fifteenth of each calendar month to all households on a regular issuance cycle. The two days should fall at approximately the same time each month.
- i) Indicate which sites offer services that meet this description. Those hours discussed in number (II A) may be taken into consideration (do not count hours which overlap at two or more sites).

<u>Site</u>	<u>Days Open/ Week</u>	<u>Hrs./Day</u>	<u>Weeks Open</u>	<u>Hrs./Mo.</u>
Example: 2 Issuance Site	M and F	3 hrs. (8 am - 11 am)	1st & 2nd week	12

Total No. Sites

Nonoverlapping Hours
Per Day

ii) Corrective action plan.

4. Assigned Issuance Sites

- a. In either an ATP or HIR System, if households are assigned a particular issuance site, are the requirements of C(1)(a) and C(2)(a) or C(3)(a) met by each site? If not, can households obtain coupons at an unassigned site so that a total of six hours is available? Describe below.

- b. Corrective action plan.

D. Issuance Points

1. Issuance services in C(2) and C(3) shall be located at sites that are within 30 miles of the residences of all or all but a small number of participants.
 - a. Is the distance from the locations identified in C(2) and C(3) within 30 miles from all participants?
 - i) If yes, describe how this was ascertained, e.g., attached map indicating 30-mile radii.

- ii) If no, what percentage of the caseload is beyond 30 miles of issuance services?

- 2. If the answer to D(1)(a) is yes, the point requirement has been met. If the answer is no, continue on.
 - a. The small number of participants which live beyond 30 miles from an issuance site must be given the option of traveling that distance or having their coupons mailed.
 - i) How is option publicized in those parts of the service area? How are households told at the time of certification of this option? (Example, posters displayed in CWD offices, fliers or stuffers sent to recipients.)

ii) Corrective action plan.

3. If more than a small number of participants live more than 30 miles from issuance sites, the county may still be meeting the minimum regulatory requirements if participants normally travel more than 30 miles to conduct personal business and/or use their coupons.
 - a. Discuss below, in detail, how far participants normally travel to conduct personal business and use their coupons and indicate how this information was obtained.

- b. Exception request/documentation OR correct action plan.

- 4. For those elderly and/or disabled households which have difficulty reaching an issuance office to obtain their normal monthly allotment, special assistance must be offered (e.g., mail issuance provided or authorize representative found).

- a. Describe what assistance will be available.

- b. Corrective action plan.

PART III. SPECIAL NEEDS ASSESSMENTS

- A. The county shall assess the certification and issuance needs of its low-income population by examining the factors below. Summarize the results of your examination of these factors, how the information was obtained, and what affect the information has on your service plan.
 - 1. Size and geographic location of the participant and potentially eligible populations in the county.

2. Transportation costs incurred to reach certification and issuance services.

3. Availability of public transportation.

4. Cyclical changes in participation due to seasonal employment.

- B. Public comments shall also be solicited on the certification and issuance services in each area. Describe below how comments were sought and summarize the comments received. How has the service plan addressed these concerns?

- C. If the county experiences significant influxes of migrant farm workers, special efforts must be made to ensure that their needs are accounted for. In addition to examining the factors in (A) above, the county must examine unique migrant transportation, issuance, and certification needs and consult with client and advocate groups. Summarize the results of your examination and what service plan is appropriate to meet migrant needs. List any migrant labor studies that were used in your examination.

Minimum Points and Hours Standards and Exceptions

<u>I. Certification Service Standards</u>	<u>Exceptions</u>
1. At least one office that provides basic certification service in each county.	1. No Exceptions.
2. Certification service within 30 miles at least four hours/two weeks of all or nearly all recipients and applicants.	2. FNS approved. Participants normally travel more than 30 miles to do business or use coupons. Four hours every two weeks of service provided at that location.
3. Thirty hours/month certification service (counties with 250 or fewer participating households).	3. FNS approved. Caseload is so small that 30 hours is excessive; or participants can receive service in nearby counties without traveling unreasonable distances.
4. Thirty-five hours/week certification service (counties with more than 250 participating households).	4. No exceptions.
5. Lunch-hour service if more than two workers.	5. State approved. Statutory or security reasons.
<u>II. Issuance Service Standards</u>	<u>Exceptions</u>
1. Issuance services for six hours each calendar week.	1. No exceptions.
2. Six hours service within 30 miles to all households on regular ATP issuance cycle within seven calendar days following receipt of ATP.	2. FNS approved. If participants on regular cycle normally travel to location more than 30 miles from residence to do business or use coupons. Four hours/two weeks service provided at that location.
3. Six hours service between first through fifteenth of month within 30 miles of all households on regular HIR issuance cycle.	3. FNS approved. Same as #2 above.

III. Maintenance of Service

1. The number of certification sites and hours and issuance hours shall not be reduced below level in January 1980.

Exception

1. FNS approved. If the caseload has changed in size or location; or if the change in level of service will improve service delivery.

FOOD STAMP PROGRAM
PUBLIC NOTICE

The county of _____ is developing a plan of service of its food stamp certification and issuance offices. Your answers to the following questions will be appreciated and will greatly assist us in developing the Plan of Service.

- . How far away are you from the nearest food stamp certification and issuance office?

. Can you visit the nearest food stamp certification and issuance office during the hours they are open? Yes _____ No _____ If no, why?

- _____
- . Do you think the location of the certification and/or issuance offices should be changed? Yes _____ No _____. If so - where do you think they should be?

- _____
- . Do you think the open business hours of the food stamp certification and/or issuance offices should be changed? Yes _____ No _____. If so - what hours should the offices be open?

Please send your answers to these questions to:

Name

County Welfare Department

Address

Thank you for your help. If you would like more information, please call
() _____ or write _____ at the above address.
Phone No. _____ Name _____